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May 10, 2021

VIA: e-Filing

The Honorable André M. Espinosa, U.S.M.J.
Martin Luther King, Jr. Blvd.
Federal Building & U.S. Court House
50 Walnut Street, Room 2037 Courtroom D
Newark, New Jersey 07102

Re: Crista Pemberton v. Township of Edison et al.
Docket No: 2:20-cv-04411
Claim No: 2018146601
DOL: March 19, 2018
Our File No: 88641

Dear Judge Espinosa:

As Your Honor is aware, our firm represents defendants, Township of Edison and Police Chief Thomas Bryan, in defense of the above-referenced matter. I trust that Your Honor received a May 7, 2021 letter from plaintiff's counsel (ECF No. 42), and that Your Honor is as confused as I am with counsel's stated positions. During our Teleconference on May 5, 2021 Your Honor made it clear that you were requesting separate five (5) page discovery status letters from each counsel addressing current discovery disputes and the parties' positions in regard thereto. My five (5) page submission dated May 6, 2021 (ECF No. 41) followed, and I expect that Mr. Bahgat will be submitting his own five (5) page letter addressing discovery issues from his client's perspective by the May 12, 2021 deadline that Your Honor had set. I feel compelled to memorialize on the docket that there is no good cause presented for the Court to strike my May 6, 2021 submission, and that my adversary's request for sanctions would be laughable, if it was not so pathetic.

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Finally, I request that Your Honor address the final paragraph at page 2 of Mr. Bahgat's May 7, 2021 correspondence by striking his entire submission (ECF No. 42) from the docket. Mr. Bahgat has clearly misplaced his "advocacy" since the only issues currently before Your Honor relate to the status of discovery. Incredibly, Mr. Bahgat asserts in his submission that I was somehow attempting "to unfairly influence the Court"! Mr. Bahgat furthermore references "what this case is about." Your Honor will learn that the case is about relationships, including that which plaintiff, the daughter of an Edison Police Captain had with defendant Pappas, and another relationship, which I'd rather not reference on the docket, but which Your Honor may come to realize places my adversary "to close to the flame."

I truly hope that Your Honor does not find this correspondence inappropriate, and the Court will appreciate that my professional and ethical responsibilities in defense of the Township of Edison and Police Chief Bryan prohibited me from simply ignoring my adversary's recent submission.

Thank you.

Respectfully submitted,

WEINER LAW GROUP LLP

By: 
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AJB:tb

cc: Joseph Bahgat, Esq. (via e-mail)
Susan Lovett, Qual-Lynx (via e-mail)
Jeremy Solomon, Litigation Coordinator (via e-mail)
William Northgrave, Township Attorney (via e-mail)
Thomas Bryan, Chief of Police (via e-mail)

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